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Case 1:07-cv-03142-GBD

JOSEPH & HERZFELD

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JOSEPH & HERZFELD LLP

Attorneys at Law

Charles Joseph Diane Hester Michael D. Palmer D. Maimon Kirschenbaum Brian F. Fredericks

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757 Third Avenue, 25th Floor New York, NY 10017 Phone: (212) 688-5640 Fax: (212) 688-2548

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www.jhllp.com

Of counsel: Andrew Dwyer*

*Also admitted in New Jersey

SO ORDERED

HON. GEORGE B. DANIELS

AUG 1

VIA FACSIMILE (212) 805-6737

The Honorable George B. Daniels United States District Judge United States District Court, Southern District of New York Daniel Patrick Moynihan United States Courthouse 500 Pearl Street, Room 630 New York, New York 10007

Salus et al. v. TSE Group, LLC et al. Re:

Civil Action No.: 07 Civ. 03142 (GF D)(DCF)

Dear Judge Daniels:

We represent Plaintiffs in the above-captioned matter. Both parties consent to the relief requested herein.

During the parties' July 17, 2007 preliminary conference before the Court, the parties discussed the possibility of mediating plaintiffs' claims. The Court instructed the parties to further discuss such possibility and provide the Court with a status update by the end of July. Please be advised that the parties have scheduled a private mediation session on August 29, 2007. Accordingly, the parties respectfully request that the Court stay the instant matter, including plair iffs' Motion for Conditional Collective Certification, Court Facilitation of Netice Pursuant to 29 U.S.C. §216(b) and A Protective Order ("Motion").

The parties shall notify the Court no later than August 31, 2007 regarding the outcome of the mediation. If the mediation is unsuccessful, the parties will then request that the Court schedule a date by which plaintiffs are to submit their reply in further support of their Motion.

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Thank you for your attention to this matter.

Respectfully submitted,

JOSEPH & HERZFELD LLP

D. Maimon Kirschenbaum (DK-2338)

cc: The Honorable Debra C. Freeman Jonathan Stoller, Esq.